

### **REMARKS**

The above amendments and following remarks are made in response to the Office action of November 1, 2007.

Claims 1 and 4 have been amended to better clarify the present invention. Support for the amendments to claim 1 can be found throughout the specification and figures as originally filed, specifically in FIG. 1. Support for the amendments to claim 4 can be found in at least FIGS. 4 and 7A-8B and page 10 of the specification as filed. Claims 1-10 are pending in the present application.

The Examiner's reconsideration is respectfully requested in view of the above amendment and the following remarks. No new matter has been added, amendments have been made for purposes of clarifying the claimed invention.

### **Claim Rejections Under 35 U.S.C. § 103**

#### ***Claims 1-5 and 9***

Claims 1-5 and 9 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Maeda (U.S. Patent No. 6,285,422, hereinafter "Maeda") in view of Epstein (U.S. Patent No. 6,801,276, hereinafter "Epstein"). The Examiner states that Maeda discloses all of the elements of the abovementioned claims except, *the polarizing layer and the light diffusing layer are integrally formed*, which the Examiner states is disclosed primarily in FIG. 2 and column 4, lines 33-64 of Epstein.

Maeda is directed to a transfective liquid crystal device with bright reflective display. (See Abstract). Maeda discloses a display device 100 including a polarizer 14, a liquid crystal panel 10, a light scattering member 15, a polarized light separator 16 and a light source 17. (See FIGS. 1, 2 and 23 and column 8, line 12 through column 12, line 63.) The polarized light separator 16 transmits light of a first polarity and reflects light of a polarity substantially orthogonal to the first polarity. (See FIGS. 2-4 and 23, and column 8, line 40 through column 9, line 27). The polarized light separator 16 and the scattering member 15 are separated from one another. (See FIGS. 2 and 23).

Maeda does not teach, suggest or disclose: **a polarizing member which transmits a first polarity of light and absorbs a second polarity of light which is substantially orthogonal to the first polarity, wherein the polarizing member includes a polarizing layer and a light-diffusing layer integrally formed with the polarizing layer and having a concavo-convex surface, and the polarizing member is disposed adjacent to the light generating section so as to generate a second and a third light by polarizing and diffusing the first light** as claimed in independent claim 1 of the present invention.

Firstly, there is no disclosure in Maeda that the diffuser 15 has a concavo-convex surface as claimed in independent claim 1.

In addition, Applicants have previously argued that the polarized light separator 16 and the diffuser 15 of Maeda, which the Examiner alleges are equivalent to the claimed polarizing member transmit a first polarity of light, e.g., the polarity parallel to the dimensions of the page as shown in FIG. 2, and **reflects** a second polarity orthogonal to the first polarity, e.g., the polarity into the page as shown in FIG. 2. Therefore, the diffuser 15 and light separator 16 are not equivalent to a polarizing member as claimed in independent claim 1.

In response to these arguments, the Examiner states on page 8 of the present Office action that, “Maeda discloses a polarizing member 15/16 which transmits a first polarity of light in Y axis direction and absorbs (reflects) a second polarity of light in X axis direction”. Applicants herein reiterate that the reflecting polarized light separator 16 of Maeda does not **absorb** a second polarity of light as claimed. Maeda instead only teaches the **reflection** of a second polarity of light. The two structures are not functionally equivalent as seems to be suggested by the Examiner; for example, the reflected light of Maeda must be absorbed elsewhere interior to the display or a deleterious light leakage will occur. In the present invention, the polarizing member absorbs the second polarity of light, thereby eliminating the need to include other light absorbing elements interior to the display.

Maeda also does not teach, suggest or disclose: **a semi-transmissive film disposed on the light generating section which transmits the first light and a first polarity of a second light which is incident to the semi-transmissive film from a**

**direction substantially opposite to the first light, and which reflects only a second polarity of the second light, wherein the second polarity of the second light has a polarity substantially orthogonal to the polarity of the transmitted first polarity of the second light; and a polarizing member which includes a polarizing layer and a light-diffusing layer integrally formed with the polarizing layer, wherein the polarizing member is disposed adjacent to the semi-transmissive film so as to generate a third and a fifth light by polarizing and diffusing the transmitted portion of the first light and to generate a fourth and a sixth light by polarizing and diffusing the reflected portion of the second light** as claimed in independent claim 4 of the present invention.

The Examiner again alleges that the reflecting plate 220 of Maeda is equivalent to the semi-transmissive film as claimed. However, the reflecting plate 220 of Maeda indiscriminately reflects all polarities of light which are incident to the reflecting plate 220 from a direction substantially opposite to the first light. (See FIGS. 22 and 23 and column 29, line 1 through column 30, line 67).

The indiscriminate reflecting plate 220 of Maeda does not teach, suggest or disclose an element which transmits a first light and a first polarity of a second light and reflects a second polarity of the second light, wherein the second polarity is substantially orthogonal to the first polarity as claimed. Therefore, the reflecting plate 220 is not equivalent to the semi-transmissive film as claimed in independent claim 4.

Epstein discloses a self-adhering optical element 2 which includes a self-adhering diffuser 28 adhesively coupled to an optical component 12. The optical component 12 may be a polarizer. The self-adhering diffuser 28 is substantially flat without any concave or convex shapes formed on a surface thereof. (See FIG. 2 and column 4, lines 33-55).

Epstein fails to cure the defects of Maeda with respect to independent claims 1 and 4 as discussed above, namely, Epstein does not teach, suggest or disclose: **a polarizing member which transmits a first polarity of light and absorbs a second polarity of light which is substantially orthogonal to the first polarity, wherein the polarizing member includes a polarizing layer and a light-diffusing layer integrally formed with the polarizing layer and having a concavo-convex surface, and the**

**polarizing member is disposed adjacent to the light generating section so as to generate a second and a third light by polarizing and diffusing the first light as claimed in independent claim 1 of the present invention; or a semi-transmissive film disposed on the light generating section which transmits the first light and a first polarity of a second light which is incident to the semi-transmissive film from a direction substantially opposite to the first light, and which reflects only a second polarity of the second light, wherein the second polarity of the second light has a polarity substantially orthogonal to the polarity of the transmitted first polarity of the second light; and a polarizing member which includes a polarizing layer and a light-diffusing layer integrally formed with the polarizing layer, wherein the polarizing member is disposed adjacent to the semi-transmissive film so as to generate a third and a fifth light by polarizing and diffusing the transmitted portion of the first light and to generate a fourth and a sixth light by polarizing and diffusing the reflected portion of the second light as claimed in independent claim 4 of the present invention.**

Thus, claims 1 and 4 are believed to be patentably distinct and not anticipated by Maeda, Epstein or any combination thereof. Claim 3 depends directly from claim 1, and thus includes all of the limitations of claim 1. Claim 9 depends directly from claim 4, and thus includes all of the limitations of claim 4. It is thus believed that dependent claims 3 and 9 are allowable for at least the reasons given for independent claims 1 and 4, which are believed to be allowable.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 3, 4 and 9 in view of Maeda and Epstein.

### ***Claims 6 and 10***

Claims 6 and 10 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Maeda in view of Epstein and further in view of Iijima (U.S. Patent No. 6,906,767, hereinafter "Iijima"). The Examiner states that Maeda in view of Epstein discloses all of the elements of the abovementioned claims except, *the light-diffusing layer having a haze value above 20%*, which the Examiner states is disclosed primarily in FIG. 2 and column 4, lines 33-64 of Epstein.

Iijima is directed to an LCD with diffuser having a particular haze value and diffuser-reflector distance, and reduced parallax. (See Abstract). Iijima discloses a display device 10 including an upper polarizing plate 12, a liquid crystal display panel 20, a light diffusion plate 30, a lower polarizing plate 15, a reflection polarizing plate 40, a light source 70 and a light reflection plate 80. (See FIG. 5 and column 11, line 40 through column 13, line 49). The lower polarizing plate 15 of Iijima is disposed above a reflection polarizing plate 40, which in turn is disposed above a light source 70 in FIG. 5, and the polarizing plate 15 is disposed above a light diffusion plate 30 and a reflection polarizing plate 40, which in turn is disposed above a light source 70 in FIG. 7. The polarizing plate 15 and the light diffusion plate 30 are separated from one another. (See FIG. 5 and FIG. 7).

Iijima does not cure the defects of Maeda and Epstein as discussed above, namely, Iijima does not teach, suggest or disclose: **a semi-transmissive film disposed on the light generating section which transmits the first light and a first polarity of a second light which is incident to the semi-transmissive film from a direction substantially opposite to the first light, and which reflects only a second polarity of the second light, wherein the second polarity of the second light has a polarity substantially orthogonal to the polarity of the transmitted first polarity of the second light; and a polarizing member which includes a polarizing layer and a light-diffusing layer integrally formed with the polarizing layer, wherein the polarizing member is disposed adjacent to the semi-transmissive film so as to generate a third and a fifth light by polarizing and diffusing the transmitted portion of the first light and to generate a fourth and a sixth light by polarizing and diffusing the reflected portion of the second light** as claimed in independent claim 4 of the present invention.

Thus, claim 4 is believed to be patentably distinct and not anticipated by Maeda, Epstein, Iijima or any combination thereof. Claims 6 and 10 depend directly or indirectly from claim 4, and thus include all of the limitations of claim 4. It is thus believed that dependent 6 and 10 are allowable for at least the reasons given for independent claim 4, which is believed to be allowable.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 6 and 10 and the subsequent allowance of those claims.

***Claims 7 and 8***

Claims 7 and 8 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Maeda in view of Epstein and further in view of Kawamoto et al. (U.S. Patent No. 6,809,782, hereinafter “Kawamoto”). The Examiner has stated that Maeda in view of Epstein and Kawamoto teaches all of the limitations of claims 7 and 8.

As mentioned above for amended independent claim 4, Maeda in view of Epstein neither teaches nor suggests **a semi-transmissive film disposed on the light generating section which transmits the first light and a first polarity of a second light which is incident to the semi-transmissive film from a direction substantially opposite to the first light, and which reflects only a second polarity of the second light, wherein the second polarity of the second light has a polarity substantially orthogonal to the polarity of the transmitted first polarity of the second light; and a polarizing member which includes a polarizing layer and a light-diffusing layer integrally formed with the polarizing layer, wherein the polarizing member is disposed adjacent to the semi-transmissive film so as to generate a third and a fifth light by polarizing and diffusing the transmitted portion of the first light and to generate a fourth and a sixth light by polarizing and diffusing the reflected portion of the second light** as claimed in independent claim 4 of the present invention.

Kawamoto is directed to a display including a diffusing layer 11, a linearly polarized light separator 12 and a light absorbing layer 13. The display also includes a liquid crystal cell 2 and an absorbing polarizer 3. (See FIG. 1 and column 4, lines 37-49). The diffusing layer 11 and the linearly polarized light separator 13 are separately formed.

Kawamoto, however, fails to cure the deficiencies of Maeda in view of Epstein with respect to independent claim 4, namely, Kawamoto fails to teach or suggest **a semi-transmissive film disposed on the light generating section which transmits the first light and a first polarity of a second light which is incident to the semi-transmissive film from a direction substantially opposite to the first light, and which reflects only a second polarity of the second light, wherein the second polarity of the second light has a polarity substantially orthogonal to the polarity of the transmitted first polarity of the second light; and a polarizing member which includes a polarizing**

**layer and a light-diffusing layer integrally formed with the polarizing layer, wherein the polarizing member is disposed adjacent to the semi-transmissive film so as to generate a third and a fifth light by polarizing and diffusing the transmitted portion of the first light and to generate a fourth and a sixth light by polarizing and diffusing the reflected portion of the second light** as claimed in independent claim 4 of the present invention.

Thus, Applicants submit that Maeda, Epstein and Kawamoto, alone or in combination, do not render obvious the subject matter of claim 4. Claims 7 and 8 depend from claim 4, and thus include the allowable elements of claim 4. It is thus believed that the dependent claims are patentable over the cited references for at least the reasons given above for independent claim 4.

Accordingly, it is respectfully submitted that the claimed invention is allowable over the cited references. The Examiner's reconsideration and withdrawal of the rejection of claims 7 and 8, and the subsequent allowance of claims 7 and 8, is respectfully requested.

**Conclusion**

In light of the above remarks, the present application including claims 1-10 is believed to be in condition for allowance.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the outstanding rejections. If there are any charges due with respect to this response, please charge them to Deposit Account No. 06-1130 maintained by Applicants' Attorneys.

Applicants hereby petition for any necessary extension of time required under 37 C.F.R. 1.136(a) or 1.136(b) which may be required for entry and consideration of the present Reply.

Respectfully submitted,

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